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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT GODINEZ,

Defendant.

CASE NO. 2:23-CR-0161-DAD

STIPULATION REQUESTING THE SETTING OF
A CHANGE OF PLEA HEARING, THE
VACATING OF EVIDENTIARY HEARING, AND
EXCLUDABLE TIME PERIODS UNDER SPEEDY
TRIAL ACT; FINDINGS AND ORDER

DATE: June 17, 2025
TIME: 9:30 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, an evidentiary hearing was scheduled for June 17, 2025. ECF No. 106. Time has been excluded until this date. *Id.* On June 6, 2025, Counsel for the defendant informed the United States that Mr. Godinez no longer wishes to proceed to trial and intends to plead guilty. Accordingly, the parties respectfully request that this Court vacate the evidentiary hearing currently set for June 17, 2025, and set this matter for a change of plea on June 17, 2025, at 9:30 a.m.

2. The defendant hereby withdraws his pending Rule 12 motions. At the conclusion of the change of plea on June 17, 2025, the parties will request that the trial in this case be vacated.

3. Finally, the defendant now moves to exclude time between June 12, 2025, and June 17, 2025, under Local Code T4.

1 4. The parties agree and stipulate, and request that the Court find the following:

2 a) The government has represented that the discovery associated with this case
3 includes over 180 gigabytes of evidence in electronic form, including criminal history
4 documents, phone intercepts and other evidence from multiple Title III wiretaps, and search
5 warrants. Much of this discovery is in the Spanish language and subject to a protective order.

6 b) Counsel for defendant desires additional time to consult with his client, and, in the
7 event this matter does not resolve by guilty pleas, to otherwise prepare for trial.

8 c) Counsel for defendant believes that failure to grant the above-requested
9 continuance would deny him the reasonable time necessary for effective preparation, taking into
10 account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by continuing the
13 case as requested outweigh the interest of the public and the defendant in a trial within the
14 original date prescribed by the Speedy Trial Act.

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f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of June 12, 2025 to June 17, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

Dated: June 12, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ ADRIAN T. KINSELLA
ADRIAN T. KINSELLA
Assistant United States Attorney

Dated: June 12, 2025

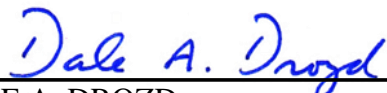
/s/ JESSE J. GARCIA
JESSE J. GARCIA
Counsel for Defendant
ROBERT GODINEZ

ORDER

Pursuant to the stipulation of the parties and good cause appearing, this matter is now scheduled for a change of plea on June 17, 2025, at 9:30 a.m., the evidentiary hearing previously scheduled for that date is vacated and time is excluded through June 17, 2025, pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

IT IS SO ORDERED.

Dated: June 12, 2025


DALE A. DROZD
UNITED STATES DISTRICT JUDGE